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April 3, 2015

VIA ECF

Hon. Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Vera v. Republic of Cuba
No. 12 Civ. 1596 (AKH)

Dear Judge Hellerstein,

I represent Banco Bilbao Vizcaya Argentaria, S.A. ("BBVA"). BBVA is filing a motion for a stay of discovery pending appeal from this Court's Opinion and Order, dated March 17, 2015, denying BBVA's motion for reconsideration and ordering BBVA to provide Aldo Vera with discovery, Docket No. 739, and from this Court's prior order for discovery, dated September 10, 2014. Docket No. 677. The deadline for BBVA to comply with Vera's subpoena is May 1, 2015. On our motion for a stay of discovery pending appeal, we have fixed the schedule per Local Rule 6.1. However, I wish to inform the Court that I intend to speak to Vera's counsel, Mr. Swift, regarding the schedule, and I reserve the right to ask the Court to shorten the schedule.

Respectfully,



Kenneth A. Caruso
Partner